This case is in harmony with the current of modern decisions. It was said in the older books that "Necessaries consist only of food, drink, clothing, washing, physic, instruction and a suitable place for residence." *Thorpe* v. *Shapleigh,* 67 Me. 235. The modern view is opposed to any arbitrary limitations by schedule, and recovery for legal services is commonly allowed. In *Conant* v. *Burnham,* 133 Mass. 303, 43 Am. Rep. 532, a husband was held liable for legal services rendered to his wife in successfully defending her against a complaint instituted against her by him for being a common drunkard. In accord is *Warner* v. *Heiden,* 28 Wis. 517, 9 Am. Rep. 515. But in *Ray* v. *Adden,* 50 N. H. 82, 9 Am. Rep. 175, an attorney who represented defendant's wife in an action brought against her for divorce, which was dismissed without prejudice, was not allowed to recover for his services. Where the wife sues for an absolute divorce her attorney commonly cannot recover from her husband, *Shelton* v. *Pendleton,* 18 Conn. 417; *Daw* v. *Eyster,* 79 Ill. 254. But where the proceedings are instituted upon reasonable grounds for a judicial separation only, recoveries for services are usually allowed. *Rice* v. *Shepherd,* 12 E. C. (N. S.) 332.

HUSBAND AND WIFE—CAN A MARRIED WOMAN BE A VAGRANT.—A married woman who lived with her husband about one-half of the time was convicted of vagrancy. On appeal the court said that the husband represents the "visible means of support" to which the statute refers and that although he is not shown to be able to support her and she is shown to be able to work and does not, yet she cannot be convicted of vagrancy. *Brown* v. *State* (Ga. 1913), 79 S. E. 1133.

This case emphasises the legal duty of the husband to support his wife. In the principal case the court said: "In the present state of the law the burden of supporting the family falls upon the husband, in return for which the law crowns him with the proud but meaningless title of 'head of the family.' If he would wear the crown he must bear the burden. Some day all this may be changed, but we are dealing with present-day law, and 'sufficient unto the day is the evil thereof.'" In *Taylor* v. *State,* 59 Ala. 19, it was held that a minor supported by her parents who have an honest occupation cannot be convicted of vagrancy although she may be a lewd woman. A common prostitute as such cannot be convicted of being a vagrant. Vagrancy is a statutory offense and the defendant must clearly come within the class named in the statute to warrant a conviction. *Forbes Case,* 11 Abb. Prac. 52.

INJUNCTION—TO PREVENT BREACH OF COVENANT NOT TO COMPETE.—Defendants were the owners of a bus line and sold it to the plaintiff. It was stipulated in the bill of sale of the property, that the defendants should not afterwards engage in the same business in the same town. Shortly after the sale had been completed, however, the mother of the defendants purchased other busses, and the defendants have been driving such busses, and practically carrying on the business, as managers for their mother. This bill is brought to enjoin the defendants from breaking their contract not to enter into the business again. *Held,* that an injunction should be granted. *Hollis-ton* v. *Ernston* (Minn. 1913) 144 N. W. 415.

There seems to be no doubt that an injunction should have been granted in this case. The court was, however, unfortunate in its selection of a case from which to quote as authority, and on which to base its decision. The case referred to is the case of *Andrews* v. *Kingsbury,* 212 Ill. 97, 101, 72 N. E. 11, 13, from the opinion in which the court in the principal case quotes the following: "Courts of equity will, and frequently do, interpose by injunction, thereby indirectly enforcing the performance of negative covenants by prohibiting their breach; and where there is an express negative covenant, courts of equity will entertain bills for injunctions to prevent their violation, even though the same will occasion no substantial injury *or though the remedy be adequate at law.*" The phrase in italics goes much further than do any of the cases or writers which *Andrews* v. *Kingsbury* cites as authority. One of the cases so cited is the case of *Hursen* v. *Gavin,* 162 Ill. 377, 44 N. E. 735. This case is not in point at all, for the question raised in that case was whether such a contract was invalid or not on the ground that it was in restraint of trade, and holding the contract there to be good as only a partial restraint of trade. The other case cited in support of the proposition is the case of *Consolidated Coal Co.* v. *Schmisseur,* 135 Ill. 371, 25 N. E. 795. The quotation above follows almost the exact words of this case until the last phrase is reached. But here, instead of the words in italics are the following:—"though the damages, if any, be recoverable at law." The difference in the two statements will clearly be seen. What the court meant in the *Coal Co.* case, was, that the fact that damages were recoverable at law would not bar the right to an injunction, for damages at law might not be an adequate remedy. Moreover the statement in the *Coal Co.* case was mere dictum, for the covenant in question was not an express negative covenant, but the plaintiff sought to enjoin the breach of an implied covenant. The whole basis of equity jurisdiction in such cases is the inadequacy of the remedy at law. POMEROY says in this connection, § 1344 (2nd Ed.), "Where stipulations are negative in form and where they belong to the class of which specific performance would be enforced if they were affirmative in form, an injunction to restrain their violation will be granted, as a general rule, and almost as a matter of course. *The inadequacy of the legal remedy is the criterion* * * *."

INJUNCTION TO PREVENT STRIKERS FROM INTERFERING WITH EMPLOYEES.—During a strike, a manufacturing concern secured an injunction prohibiting the defendant and other members of the labor union to which defendant belonged, from interfering in any way with the employees of such company. The evidence showed that defendant had stationed himself near the entrance to the works of the company, for the purpose of annoying and interfering with the employees thereof. *Held,* that such evidence justified the lower court in holding defendant guilty of contempt. *In re Langell,* (Mich. 1914), 144 N. W. 841.

The decision in this case seems to be in line with the weight of authority. Three of the justices, however, dissented from the majority holding. The ground on which the dissenting opinion was based was that under the accepted definition of picketing, as laid down in *Beck* v. *Teamsters' Union,* 118